

**Verizon New England Inc.
d/b/a Verizon Massachusetts
Commonwealth of Massachusetts**

Docket No. 03-60

Respondent: Jack Conroy
John White

Title: Vice President – MA
President 8 Degree Research &
Consulting

REQUEST:

Attorney General's Third Set of Information Request

DATED:

January 21, 2004

ITEM: AG 3-1

Does Attachment 1, Part 2 of the Supplemental Panel Testimony of John Conroy and John White contain all of the Common Language Location Identifier (CLLI) codes that Verizon considers to be competitive? If not, please provide the following data in table format for each MSA in Attachment 1, Part 2 of the Supplemental Panel Testimony of John Conroy and John White.

- A. A list of all of the CLLIs that Verizon considers competitive separated by density zone.
- B. The total number of voice grade equivalent lines served by CLECs associated with each CLLI.

Please supply the data in an Excel spreadsheet files as well as in a paper version.

REPLY:

- A. All of Verizon MA's wire centers in Massachusetts are competitive. Attachment 1, Part 2 of the Supplemental Panel Testimony of John Conroy and John White identifies 145 wire centers (CLLIs) that meet one or both of the FCC's mass market switching triggers. That attachment shows the number of access lines that each competing carrier is serving using its own switching, separated by MSA, density zone, and wire center.
- B. The attached Exhibit MA AG 3-1 shows the total number of voice grade equivalent lines served by CLECs using UNE-P or Resold Services in all wire centers in all density zones in the relevant three MSAs where Verizon MA is seeking relief at this time. The information provided in the Exhibit is proprietary, confidential, and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.

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ITEM: AG 3-2 Please provide the following data:

- A. The total number of Verizon CLLIs in MA.
- B. The number of CLLIs that are either in Zone 4, Pittsfield MSA, Barnstable MSA, or that have no MSA assignment (do not double count any CLLIs).
- C. The number of CLLIs included in Attachment 1, Part 2 of the Supplemental Panel Testimony of John Conroy and John White.
- D. The amount and an explanation of the difference between items 1 and 2 below:
 1. The count in item A less the count in item B;
 2. The count in item C.

- REPLY:**
- A. There are 274 wire centers in Massachusetts.
 - B. There are 89 wire centers that meet the criteria stated in part B.
 - C. There are 145 wire centers included in Attachment 1, Part 2 of the Supplemental Panel Testimony of John Conroy and John White.
 - D. The difference between items 1 and 2 in part D is 40 wirecenters. These wirecenters did not have in-service unbundled loops or residential E911 cable listings.

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ITEM: AG 3-3 Please refer to the Verizon response to AG-VZ 1-2 (VZ#60), the column heading entitled "New MSA."

- A. Has Verizon performed any analyses similar to that provided in Attachment 1, Parts 1 and 2 of the Supplemental Panel Testimony of John Conroy and John White using different MSA definitions? If so, please provide the analyses in both Excel worksheet format and paper format.
- B. Did Verizon perform any analyses similar to that provided in Attachment 1 of the Supplemental Panel Testimony of John Conroy and John White using the New England City and Town Area (NEC&TA) Division section of the MSA definitions published in June 2003? See OMB Bulletin No. 03-04 dated June 6, 2003, List 6; <http://www.whitehouse.gov/omb/bulletins/b03-04.html>. If so, please provide the analyses in both Excel worksheet format and paper format.
- C. Did Verizon perform analyses similar to that provided in Attachment 1 of the Supplemental Panel Testimony of John Conroy and John White using MSA definitions published earlier than 2003? If so, please provide each analysis in both Excel worksheet format and paper format. Please clearly indicate the sources and dates of the alternative MSA definitions.
- D. Please provide Verizon's rationale for choosing the 2003 version of MSA definitions rather than the definitions used

for the FCC Wireless Local Number Portability (LNP) proceedings (FCC 03-237, Order released 10/7/03, <http://wireless.fcc.gov/wlnp/documents/top100.pdf>).

- E. What sources (specifically, which OMB list) did Verizon utilize for their MSA definitions?
- F. Please provide Verizon's rationale for choosing the list in Part E above over List 6 from the same OMB Bulletin (03-04)?

REPLY:

- A. Verizon MA objects to this Information Request on grounds that it seeks the disclosure of information protected from discovery by the attorney-client privilege and/or the attorney work product doctrine.
- B. Verizon MA objects to this Information Request on grounds that it seeks the disclosure of information protected from discovery by the attorney-client privilege and/or the attorney work product doctrine.
- C. Verizon MA objects to this Information Request on grounds that it seeks the disclosure of information protected from discovery by the attorney-client privilege and/or the attorney work product doctrine.
- D. Verizon MA used the latest MSA definitions that were available from the government source that officially publishes this data. These definitions were the June 2003, OMB MSA definitions. See cite at http://www.whitehouse.gov/omb/bulletins/b03-04_attach.pdf
- E. Verizon MA used List 2 from the OMB bulletin b03-04.
- F. Verizon MA objects to this Information Request on grounds that it seeks the disclosure of information protected from discovery by the attorney-client privilege and/or the attorney work product doctrine.